

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In The Matter Of:)	
)	
Establishment of a Low Power Radio)	MM Docket 99-25
Service)	

REPLY COMMENTS OF REC NETWORKS
on behalf of people in the Town of Boron, California.

1. These reply comments are being issued in response to the comments, which are advocating the use of the Internet as an alternative to LPFM. I would like to bring to the Commission's attention that not all rural communities, which have an immediate need for LPFM stations, currently do not have access to the Internet.

2. Boron, California is a Census Designated Place (CDP) in Kern County on the border of San Bernardino County with a 1990 Census population of 2,101. Boron has it's own post office (ZIP Code 93516) with street delivery service, it's own telephone exchange (760-762), several churches, retail stores, service stations, famous Mexican restaurant, Chamber Of Commerce, public library, county maintained parks, volunteer fire department, Sheriff's Department sub-station as well as elementary and high schools in the Muroc School District. Boron is the home of the open-pit mine of Borax Global and is the nation's leading supplier of borax. The Chamber of Commerce also operates the Twenty Mule Team Museum which features the history of the area, including the areas around Boron and Edwards. Based on the population and commercial activities that this town has to offer, it could qualify as a community for allotment purposes under §73.202.

3. However, due to its close proximity to the Los Angeles metropolitan area (actually it's close proximity to Mount Wilson), there are no channels available for Class-A facilities.

The nearest communities to Boron with an allotment are Mojave (48.6km), California City (25.2 km), Lenwood (51.7 km) and Barstow (55.2 km). Currently, there is only one station (KCEL in California City) which has Boron in their 60 dBu service contour.

There is also pending rulemaking which would add an allotment to Edwards (moved from Johannesburg) which would bring a second station which would have most of Boron in their 60 dBu service contour. Boron is a distinctive but isolated community it is separated by mountains from California City and is separated from Edwards because Edwards is a military base and is a closed community. Therefore, the station in California City and the proposed station in Edwards can not meet the distinctive needs for the community of Boron.

4. Boron is located along State Highway 58 and is also located along a Burlington Northern Santa Fe (BNSF) Railroad mainline. Hazardous materials being transported by rail and the road pose a risk to the community of Boron. Without a means of mass communications, such as an LPFM station could result in some dangerous circumstances in the event of a major accident.

5. Because Boron is not an incorporated city and also because the community is not located at the intersection of an Interstate highway, Boron can not be licensed for a station in the Travelers Information Service (TIS).

6. The Boron, California (telephone) rate center comprises of two central offices, Boron (BORNCAEFRS3, 760-762) which has about 2,000 access lines and North Edwards (NEDWCAEFRS4, 760-769) which has less than 1,000 access lines. The Boron exchange is not a local call to any rate center outside of Boron. At this time, no internet service provider is currently offering dial-up service in the Boron area. This is due to the low number of access lines and the distance to the nearest community. For people in Boron, connecting to the internet means calling to Barstow, Lancaster/Palmdale or Victorville which are intra-LATA toll calls. For a "web caster", providing a service for Boron would involve extensive mileage charges for dedicated leased lines (T1 or Frame Relay) to one of these communities. In all ways, there would be a great expense on both the listener and broadcaster in this situation. This is not in the public interest.

7. According to the REC Channel Search Tool, which takes into consideration the interference standards that were proposed by the FCC and counter-proposed by REC Networks, shows that there is at least one channel in the non-reserved band which can be used for a 1,000 watt (LP-1000, A1) station and several channels that can handle 100 watt stations (LP-1000, A3). These "100 watt" channels can also handle the "transitional" 250 watt service proposed by Amherst Alliance and supported by REC Networks is it's proposed "Class A2" service.

8. In Conclusion. Allowing the creation of the Low Power Radio Service without any further delay will allow communities like Boron to finally be to have a voice for their community which has based in their community.

Respectfully Submitted,

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EXHIBIT "A" - Channel Study to add Channel 227D1 (93.3 MHz) in Boron, CA as an LP-100 (100 watt) station.

Call	Location	Class-sub class	Dist.	Min.	Clear?
Ch. 224 (Third Adjacent) 92.7					
KLIT	Avalon, CA	A	194.7		Clear
KKUU	Indio, CA	A	187.7		Clear
K224BO	Naples, CA	D-sub class "C"	217.8		Clear
KZIQFM	Ridgecrest, CA	B1	52.6		Clear
K224AR	Beatty, NV	D-sub class "A"	227.5		Clear
KMLT	Thousand Oaks, CA	A	147.9		Clear
KELT	Riverside, CA	A	95.6		Clear
Ch. 225 (Second Adjacent) 92.9					
K225AE	Desert Hot Sprs., CA	D-sub class "A"	168.6		Clear
KXFG	Sun City, CA	A	163.3		Clear
KJEE	Montecito, CA	A	195.0		Clear
KFSO-FM	Visalia, CA	B	215.4		Clear
Ch. 226 (First Adjacent) 93.1					
KCBSFM	Los Angeles, CA	B	94.1	84	Clear
KQOLFM	Las Vegas, NV	C	222.3	142	Clear
Ch. 227 (Co-Channel) 93.3					
KHTS	El Cajon, CA	B	264.4	143	Clear
K227AG	Beatty, NV	D-sub class "A"	227.7	30	Clear
KRHV	Big Pine, CA	B	222.8	143	Clear
K227AB	Bakersfield, CA	D-sub class "C"	110.2	67	Clear
KZOZ	San Luis Obispo, CA	B	276.6	143	Clear
Ch. 228 (First Adjacent) 93.5					
K228CO	Barstow, CA	D-sub class "A"	57.3	26	Clear
K228AJ	Victorville, CA	D-sub class "C"	97.5	35	Clear
K228CL	Beatty, NV	D-sub class "A"	226.2	26	Clear
KNAC	Earlimart, CA	A	179.6	49	Clear
KLKX	Rosamond, CA	A	58.7	49	Clear
KADD	Laughlin, NV	C1	299.8	111	Clear
KFOX	Redondo Beach, CA	A	148.6	49	Clear
KREA	Ontario, CA	A	92.2	49	Clear
K228CV	Big Pine, CA	D-sub class "A"	233.9	26	Clear
Ch. 229 (Second Adjacent) 93.7					
NEW-T	Rancho Bernardo, CA	D-sub class "A"	230.1		Clear
KSKS	Fresno, CA	B	280.6		Clear
KCLBFM	Coachella, CA	B	187.1		Clear
KDB	Santa Barbara, CA	B	195.0		Clear
NEW-T	Newhall, CA	D-sub class "A"	100.7		Clear
Ch. 230 (Third Adjacent) 93.9					
KZLAFM	Los Angeles, CA	B	94.0		Clear

"Sub class" refers to the secondary classes that REC has assigned to translators in it's comments.